

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE *EX PARTE* APPLICATION OF
Saul Klein

Petitioner,

For an Order Pursuant to 28 U.S.C. § 1782 to Take
Discovery for use in Foreign Proceedings in the Federal
Republic of Brazil.

No. Misc. 23-211

**EX PARTE APPLICATION AND PETITION FOR AN ORDER TO CONDUCT
DISCOVERY FOR USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782**

Petitioner Saul Klein, pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit A to the “Memorandum of Law in Support of *Ex Parte* Application For Order Pursuant to 28 U.S.C. § 1782 Authorizing Petitioner to Conduct Discovery For Use in Foreign Proceedings” in the form of the subpoenas attached as Exhibit B to the same. In support of his application and petition, Petitioner submits a Memorandum of Law and attaches the declarations of Luiza A. Vasconcellos Oliver (the “Oliver Decl.”) and Katia Vilhena Reina (the “Reina Decl.”), both dated June 23, 2023, in addition to exhibits attached to the declarations.

Dated: June 28, 2023.

Respectfully Submitted,

/s/ Gabriela M. B. Scanlon

MB SCANLON PLLC
4301 50th Street NW, 1st
Washington, D.C., 20016
Phone: (202) 410-9293
gabriela@mbscanlon.com